



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

0002

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March 15, 1993

Mr. W. Roy Benson
Mine Manager
Geneva Steel
P.O. Box 2500
Provo, Utah 84603

Dear Mr. Benson:

Re: Review of Draft Permit Amendment, Geneva Steel Company, Iron Mountain Mines M/021/008, Iron County, Utah

The Division has completed its review of Geneva Steel Company's (Geneva) latest permit amendment document. Please accept our apology for the unforeseen delay in responding to this submittal. It is our intention to make every effort to avoid any excessive delays in the future.

Geneva has conducted mining activities on properties permitted by themselves and other operators for a number of years now. Geneva has now purchased and transferred the permits from several of these previously approved mining properties in the Iron Mountain area. The Division asked Geneva to prepare a revised permit application consolidating all of the pertinent information from the older permits into one new application which reflects Geneva's past, present and future mining and reclamation plans.

After reviewing the amended application, the Division has the following comments which will need to be addressed before tentative approval may be granted. The comments are listed below under the applicable Minerals Rule heading. Please format your response in a similar fashion.

General Comments

On page 7, section 4.0, reference is made to figure 5, this is believed to refer to figure 3. Please verify/clarify this.(AAG)

R647-4-105 Maps, Drawings & Photographs

105.1 Topographic base map, boundaries, pre-law disturbance

Drawing IM-0100-9, Pre-Act Disturbance, will require further clarification to distinguish between "pre-law" areas that have been re-impacted by Geneva's (or other operator's) post-law mining activities and those that have not been re-impacted. Another map(s) may need to be used or referenced to clarify this. Please include an acreage breakdown by area and category. (DWH)

105.2 Surface facilities map

The general border describing the limits of the disturbed area are acceptable. The IM-0100-3 drawings, sheets 1 through 6, should contain borders describing individual areas which correlate with the areas and acreage listed in Table 1A.(AAG)

Drawing IM-0100-3, sheet 2 of 6, does not contain a border identifying the area associated with the Duncan Pit Road, although Table 1A includes a figure for this area. Please explain this discrepancy and modify the drawing if appropriate.(AAG)

The border for the Mtn. Lion Waste Dump (sheets 5 of 6), drawings IM-0100-3 and IM-0100-1, do not agree. Please modify the drawings or explain the discrepancy.(AAG)

Drawings IM-0100-3, sheets 5 & 6, have been reduced. Please identify any reduced drawings and the magnitude of the reduction. Please include a graphic bar scale on any drawings to be reduced.(AAG)

Drawing IM-0100-6, sheet 6, includes what is believed to be undisturbed areas within a disturbed area. Please confirm this and label these areas appropriately on the drawings.(AAG)

What is the feature labeled "YJ Pit" on drawing IM-0100-3, sheet 6?(AAG)

105.3 Drawings or Cross Sections (slopes, roads, pads,etc.)

The operator needs to provide more detail on the maps, describing post-mining or reclamation treatments for each area of disturbance. Areas which have been or will be disturbed, but will not be reclaimed (due to a variance request) should be clearly indicated with a border or cross hatching on the appropriate drawings. The acreage of this disturbed, but unreclaimed area should be indicated. Also, areas which have been disturbed, but will be subject to some type of reclamation treatment should be indicated along with the type of reclamation treatment. All areas where the standard treatment will be used (e.g. topsoil, seed, fertilize) should be indicated on the map. (AAG and HWS)

Drawing IM-0100-11, sheets 1 & 2, identify projected groundwater contour lines for the Iron Mountain - Comstock area. The contour lines are apparently based upon the following data: 1950's exploration hole data, local wells, and ponded pit water elevation measurements. The limited extent of monitoring data used to predict these contour lines, makes the relevance of this information (characterizing current groundwater elevations) questionable.(DWH)

The groundwater projections appear to be based principally upon one time measurements. Most of the data is 15-30+ years old and was not made part of the application/appendices. It is unrealistic to assume that groundwater conditions have remained unchanged over the past 15-30 years. Additional sampling from the pits, monitoring wells and possibly springs over an extended period of time is needed to establish valid baseline conditions and to document any localized trends. Therefore, without further detailed supporting documentation and more

recent data, the Division cannot concur/accept the groundwater level projections as presented on these drawings. See additional comments under R647-4-106.8 below. (DWH)

R647-4-106 Operation Plan

106.4 Nature of materials mined, waste & estimated tonnages

Page 39, Section 13.5 - Toxic/Deleterious Materials, identifies 3 materials (overburden waste, lean ore & wet plant waste) at the mine site that were sampled for maximum acid potential and neutralization potential. Page 26, section 10.0, the plan indicates that acid mine drainage potential from waste rock ore and pits is very low, based upon results of sampling conducted in 1991. The 1991 sampling analyses were not found in the plan and should be included as part of the application. Please describe sampling methodology used to select representative samples for analysis (location, volume of material sampled and number of samples taken), and the laboratory analytical methods used to analyze the samples. An estimate of the annual tonnages of ore and waste could not be found in the submission. Please provide an estimate of these figures. (DWH & AAG)

106.6 Plan for protecting & redepositing soils

Does the operator plan to establish any topsoil stockpiles? Do any topsoil stockpiles currently exist on site other than the Anthill area? Will material for topsoiling during reclamation come entirely from the Anthill area? If this material is to be placed over all of the disturbed areas in lieu of salvaged topsoil please verify. Also, please provide an analysis of this material (Anthill) to the Division (e.g.: Ph, SAR, N, P, K, organic matter content, CEC, texture, % calcium carbonate, % saturation) (HWS)

106.8 Depth to groundwater, extent of overburden, geology

Section 7.2, pages 14 - 18, describes the local groundwater regime in the Iron Mountain area. Many predictions/projections are based upon known geologic and structural information from the Iron Mountain area. The estimated depth to groundwater is also based upon interpretations made from the groundwater contour map included with the application. At this time, the Division cannot concur with the interpretations made in the application regarding local groundwater depths (also see R647-4-105.3).

The actual data used to generate the contour maps was not made part of the application and could not be evaluated. Therefore, we do not know how extensive the groundwater depth information is, how it was collected, and how realistic/representative it may be. On page 15, the text indicates that the groundwater contour maps were generated from water level measurements obtained from exploration drill holes in the 1950's. It is doubtful that data obtained 40 years ago is still representative of current groundwater level conditions. More recent groundwater measurements are necessary to substantiate/confirm these older water level contour projections.

Water level measurements taken of the ponded pit waters are also limited. A longer period of pit water level measurement is required before the monitoring information can be considered representative and/or statistically valid. A renewed pit water level monitoring program, based upon a monthly or bi-monthly frequency, is recommended to help establish current and seasonal trends. At least one full years worth of monitoring is recommended to establish baseline conditions. Continued water level monitoring, on a reduced basis, would follow to identify any possible trends. For increased accuracy, local (onsite preferred) rainfall and evaporation rates would also need to be evaluated/recorded to allow for seasonal climatic influences/changes in pit water levels. Pit water pumping/discharge records would also need to be documented.(DWH)

R647-4-107 Operation Practices

107.1.12 Disposal of trash, scrap, debris

Please describe how trash and debris generated during operations is treated/disposed of?(AAG)

107.2 Drainages to minimize damage

Page 36 of the submission states that impoundments and drainages will be adequately diked with rip-rap. Please identify all locations (in the text and on the appropriate drawings) to receive these treatments and describe their design. Also provide justification for that design based on storm events, drainage basin, etc.(AAG)

107.3 Erosion control & sediment control

The application should contain a section describing the erosion and sediment control techniques/methods being utilized to minimize onsite erosion and sediment loss. The process/surface facilities map(s) should identify the type and location of these erosion control structures (e.g., load-out, crushing and staging areas, roads, etc.)(DWH)

107.4 Deleterious material safely stored or removed

See comments under R647-4-109.1 below.

107.6 Concurrent reclamation

The operator has not commented on any plans to implement contemporaneous reclamation. Will any reclamation commence during the time that the mine is active? If so what will be the locations and approximate time frame? The Division strongly recommends contemporaneous or concurrent reclamation where practicable. (HWS)

R647-4-109 Impact Assessment

109.1 Impacts to surface & groundwater systems

Page 25, Section 10.0, Groundwater Impacts, indicates that the operator does not anticipate any mining-related impacts to the local or regional groundwater regimes. Page 19 of the submission contains information regarding water quality based on 3 samples of open pit ponds and one well sample taken over 15 years ago (1977). Has any recent sampling been performed? A single series of 4 samples is not sufficient to adequately characterize the water quality of an area. A series of samples taken from multiple sources over an extended period of time is necessary to correctly establish and characterize the baseline water quality of an area.(AAG/DWH)

More recent water quality information is necessary to substantiate the older monitoring results. A water quality monitoring program should be developed to establish baseline conditions and identify any changes or trends that may occur from this point forward. In-pit sampling of ponded water, wells, related springs and any other representative surface water sources should be included in the water quality monitoring plan. A minimum frequency of quarterly water quality sampling should be undertaken for at least one full year. Depending on the results of the data obtained from the first years monitoring, a reduced sampling frequency may be applicable for continued monitoring to help establish any localized changes or trends. A full suite of standard water quality chemical parameters should be initially analyzed in establishing baseline conditions. Refinements can be made to the water quality parameter list after the initial series of sampling results are evaluated by the Division. We can provide you with a recommended parameter list or review a proposed list from Geneva.(DWH)

Have the 3 local springs been sampled for water quality? Do the springs flow continuously? If sampled, how does the water quality compare to that obtained from other local wells and/or the pits? Is there any direct relationship or correlation between the local aquifers intercepted by the open pit mining operations and the aquifer(s) discharging at the springs?

On page 15, four (4) local wells are referenced under the groundwater section. Only 2 of the 4 wells are shown on the surface facilities map IM-0100-4 (Section 29, T36S, R13W & Section 2, T37S, R14W). All of these wells should be shown on the appropriate map(s). Is it possible to access any of these wells for continued water level and water quality monitoring purposes? If so, what are the formation(s) and associated aquifer(s) that the wells were completed in? Is there any relationship to, or possible interception of these aquifers from past, present or future mine development?(DWH)

On page 25, section 10.0, surface water impacts are discussed. The plan indicates that no impacts are anticipated. A statement is made that all mines are eventually subject to EPA's new Stormwater Discharge Permit requirements. What is the significance of this statement, and how does it add support or justification to the operator's assessment of no impacts to surface waters?(DWH)

109.4 Slope stability, erosion control, air quality, safety

Page 26, Section 10.0 - Environmental Impact Assessments, refers to the reclamation plan for comments on slope stability impacts. The reclamation plan includes one sentence generally addressing this subject. Please provide additional information describing the existing and possible impacts on slope stability at specific sites (i.e., pits where highwalls slopes exceed 45°). What are the possible impacts to operational facilities from a debris flow described on page 27?(AAG)

109.5 Actions to mitigate any impacts

Please describe any actions existing or proposed to mitigate the above mentioned impacts.(AAG)

R647-4-110 Reclamation Plan

110.2 Roads, highwall, slopes, drainages, pits, etc. reclaimed

The operator has designed this plan to cover a five year term and does not describe a reclamation application for areas which are to be reclaimed beyond the five year term. The submission discusses and displays areas of the site, termed "delayed mining areas, no reclamation next five years." These areas are currently disturbed, or will be disturbed in the future. Although not included in the five year reclamation plan, they are included in the overall surety estimate.

The Division requests that a description of reclamation be provided for these areas. If possible, the Mining and Reclamation Plan should cover all known and projected disturbances for the life of mine. The surety estimate is to be renewed every five years to keep up with inflation, changes to the mine plan, and to evaluate the status of the surety vehicle. The operator has the option of amending the Mining and Reclamation Plan, in the future, if plans for these areas change significantly. (HWS)

The submission repeatedly describes the reclamation treatment for roads as scarifying to a depth of 6 inches. This apparently originates from the Division's own recommendation under Seed Bed Preparation, of the 2/88 application notice. The Division has amended that recommendation and now requires that all roads and other compacted surfaces be ripped to depth of 1 - 2 feet with a dozer. Please modify the plan accordingly.(AAG & HWS)

No description of reclamation of the borrow area next to the Blowout Pit as mentioned on page 30, drawing IM-0100-3, sheet 3 of 6, was included in the submission, although seeding of this area is included in Table 1A. Please include a verbal description of the reclamation treatments proposed for this area.(AAG)

On page 31, in reference to the Chesapeake/Excelsior area, the submission states that other waste dumps existing down slope will be hand broadcast seeded. What are the slope angles of these dumps and how will they be stabilized for seeding? Also, no dumps are shown on drawing IM-0100-3, sheet 4 of 6. Please clarify this and modify the drawing as appropriate.(AAG & HWS)

On page 31 of the submission, the Tip Top pit area is to be leveled and graded as necessary to match natural slopes where feasible. In this same section it is said that no blasting or major resloping of the highwall is to be done. Please clarify these conflicting statements. Also, in reference to the Tip Top area, the submission states that other waste dumps existing down slope will be hand broadcast seeded. What are the slope angles of these downslope dumps and how will they be stabilized for seeding? (AAG and HWS)

Page 31 of the submission, drawing IM-0100-3, sheet 5 of 6, states that the existing Mountain Lion Dump will be reclaimed as described in prior permits. This plan should include a description of the reclamation treatments outlined in the prior permits. Page 32 of the submission does not include a proposed reclamation plan for the future Mountain Lion Dump. A reclamation plan for this future dump will need to be included as part of this submission.(AAG)

Page 32 of the submission does not include a description of the reclamation treatments proposed for the railroad spur. A description of the reclamation treatments for the existing spur and spur expansion will need to be included.(AAG)

Page 33-34, Table 3A lists reclamation area specifications for the Comstock/Mt. Lion and Duncan pits as not being subject to revegetation. A breakdown of the total pit acreage, estimated roadway/bench acreage, estimated highwall/slope acreage for the Comstock/Mountain Lion pit(s) is needed.(AAG)

Page 34 refers to prior permits for a description of the reclamation treatments for the Lean Ore Stockpile and Ore Handling and Maintenance Shop areas. Please include a description of those previously approved reclamation treatments in this submission.(AAG)

Page 36 discusses waste dump slope reclamation. The text indicates the waste dump slopes will be contoured to grade, topsoiled and drill seeded. We are assuming that this reclamation treatment is only planned for the three waste dumps identified on page 33, Table 3 - Reclamation Area Specifications (Tip Top, Mtn. Lion & Comstock). If other waste dumps are to be included please revise the plan accordingly. Please explain what is meant by "contoured to grade"? Does contouring apply to the waste dump out slopes or just the top of the waste dumps? Does "grade" refer to 26 degrees as mentioned later in the plan? Please identify those slopes which will have a grade of 26 degrees at final reclamation and those slopes which will not (if any). If the out slopes will be contoured, to what slope angle? Division experience indicates that out slopes steeper than 3H:1V, probably cannot be successfully drill seeded without using specialized equipment or atypical grading/contouring techniques.(AAG/DWH)

Page 36 also discusses allowing the pits to reach their natural water level upon final reclamation. What are the anticipated water depths for pits when mining ceases? What is the anticipated water quality (can be addressed under R647-4-109.1)? What long-term public health and safety protection measures are proposed to prevent unauthorized entry and use of these dangerous impoundments?(DWH)

110.5 Revegetation planting program

The continuation page of Table 1A describes two revegetation programs. One for "Old Permit" areas and one for "New Permit" areas. Please describe the treatments proposed for both these areas in more detail (i.e., regrading, scarification, seed mix, mulch rate, fertilizer rate, etc.). Page 38 of the submission states that mulching will be required in areas of excessive erosion as discussed in the application. Please identify areas and acreage which are proposed to receive mulch and those which will not receive mulch.(AAG)

R647-4-111 Reclamation Practices

111.1.12 Disposal of trash & debris

Page 37 states that buildings, utilities, pads and surface equipment will be removed, buried, covered and areas reseeded. Please describe which facilities will be buried onsite (if any) and where they will be buried. Also describe the minimum depth of material proposed to cover these demolished/buried structures.(AAG)

111.6 All slopes regraded to stable configuration

Page 31 describes reclamation of the Tip Top dump as being broadcast seeded. This dump was constructed at the angle of repose and is believed to contain material of ROM size. Broadcast seeding alone may not be adequate reclamation of this dump. A slope stabilization application, and hydroseeding with mulch, tackifier and fertilizer may be required if this area will not be regraded and topsoiled. (AAG & HWS)

111.8 All roads & pads reclaimed

As previously mentioned, all roads, pads and compacted areas should be ripped to a 1-2 ft depth.(AAG)

111.9 Dams & impoundments left self draining & stable

Will the Tip Top and Chesapeake/Excelsior pits impound water? If so, what is the anticipated (or known) water quality? Assuming favorable water quality, will wildlife have reasonable access to this water?(AAG)

111.12 Topsoil redistribution

Page 31 of the submission states that additional soil will be added to existing topsoil beneath the dump (in the Chesapeake/Excelsior area) during reclamation. What is the source of this additional soil?(AAG)

On Sheet 5, drawing IM-0101-3, the border shown encompassing the Anthill area includes some 40.77 acres. Table 1A and the plan describe 13.09 acres of this area as being disturbed for the recovery of topsoil material. Please explain this discrepancy.(AAG)

Table 3 describes the area for the Lean Ore Stockpile as being 82.47 acres requiring 6 inches of topsoil which is listed as 29,639 cubic yards. The cubic yards figure does not correlate to 6 inches over 82.47 acres. Also, Table 1A lists 36.74 acres for the Lean Ore Stockpile area. Please clarify/correct this.(AAG)

R647-4-112 Variance

R647-4-111(1.13) Reclamation Practices - Hole Plugging Requirements

The Division will grant a variance for R647-4-111(1.13), for the plugging of any drill holes which are inaccessible because they have been mined through or are under water. Geneva will be required to plug any drill holes which are accessible at the time of final reclamation.(AAG)

R647-4-111(8) Reclamation Practices - Roads and Pads

The Division will grant a variance for the roadway to the radio tower to remain upon final reclamation. However, a 40-50 ft. road width is not required to retain access to the tower. The Division will require that this roadway be reduced to a 20-foot wide single lane. The excess width should be reclaimed by recontouring, ripping and reseeding.(AAG)

R647-4-111(1.15) Reclamation Practices - Highwall Berm Construction

Page 40 of the submission requests a variance for constructing highwall berms at the Comstock/Mt. Lion pit. In order to consider this variance request, the Division requires additional information regarding a specific location description and a more descriptive justification for the variance. In your justification, for each site please address the issues of: degree of hazard, accessibility, vertical height, bench width and spacing, surrounding natural terrain and construction equipment limitations. Please clarify whether this variance request is meant to apply to all pits.(AAG)

R647-4-111(2) Reclamation Practices - Drainages

Page 40 of the submission requests a variance from stabilizing drainages. In order to consider this request the Division will require additional information describing the location(s) and specific circumstances at each location which justify the variance request. Please identify

all drainage areas which will be impacted, those areas which will receive stabilization treatments and those areas which will not receive stabilization.(AAG)

R647-4-111(7) Reclamation Practices - Highwalls

Page 41 of the submission requests a variance from the highwall configuration of 45 degrees for the Comstock/Mt. Lion pit. In order for the Division to consider this request additional information is needed describing each site and justification for the variance at each site. Is this variance requested for the highwall in the northwest corner of the Mt. Lion pit? Please clarify whether this variance request was also meant to apply to the other pits (Tiptop & Excelsior).(AAG)

R647-4-111(9) Reclamation Practices - Dams & Impoundments

On page 36, the plan indicates that the pits will be allowed to reach their natural water level depending on the aquifer supplying the groundwater. R647-4-111(9) requires all water impounding structures to be self-draining and mechanically stable unless shown to have sound hydrologic design and to be beneficial to the post-mining land use. The operator must demonstrate that the water impounding pits comply with the requirements of this rule. A variance request with justification will otherwise be necessary.(DWH)

R647-4-111(13) Reclamation Practices - Revegetation

In the first paragraph (page 41), it is unclear if the operator is requesting a variance to the 70% revegetation success standard for the entire mine site area, or just for the interior of the pits? Please clarify what is being requested and provide supporting justification. In the second paragraph, a variance is requested from revegetating the interior slopes of the Comstock/Mtn. Lion pit. In consideration of this request, the Division requires an acreage breakdown of the entire pit area, estimated road/floor acreage and estimated interior highwall/slope acreage. Please justify why it is not feasible to seed the pit floor, access roads or benches. Was this variance request meant to apply to the other pits as well? If so, please provide the same information requested above for those pits. All areas where variances have been requested need to be identified on the reclamation treatments map.(AAG/HWS)

R647-4-113 Surety

Unit costs in Table 1A for reclamation treatments appear to reflect what it would cost Geneva to perform the reclamation, however, the Division must base the surety estimate on third party costs. According to the Rental Rate Blue Book and the Means Site Work Cost Data, the following unit costs were arrived at: ripping (formerly scarifying) with a Cat D10N dozer \$486/acre, regrading with a Cat D10N dozer \$0.48/CY, topsoiling with a water truck, two D10N dozers and two 657E scrapers \$833/hr, and mulching-fertilizing-seeding the new permit areas unit costs \$699/acre. It was assumed that all new permit areas would receive mulch and fertilizer. Please elaborate on the details of the revegetation program for the new permit areas (i.e., acreage & treatments for each area). Please revise the surety estimate using these unit

costs which are felt to more accurately reflect current "third party" costs. Also, Division estimates generally include costs for mobilization/demobilization of \$1,000 for each piece of large equipment. The Division adds in a contingency of 10% of the subtotal and then escalates the new total five years into the future. The current escalation factor used by the Division is 1.27%.(AAG)

Reclamation of the Anthill area as described in page 33 of the submission is not reflected in the Table 1A costs. Specifically, page 33, describes this area as being leveled, graded to slope, scarified, reseeded, fertilized and mulched. Table 1A identifies this area as being seeded only. Please clarify this or revise the table.

Please indicate the units in the headings on Table 3, pages 33 and 34. Specifically, volume in cubic yards (CY).(AAG)

The surety estimate does not contain figures for the stabilization of drainages/channels although the submission mentions diking and stabilizing. Please explain the reason for this omission.(AAG)

In the Surety Estimate section of the submission, it is stated that 477 acres will be reclaimed and the following sentence states that all but 2.8 acres will be reclaimed. Please clarify these statements by providing figures for the total acreage disturbed, the acreage disturbed but not reclaimed, and the acreage disturbed and reclaimed. The acreage disturbed but not reclaimed should agree with the acreage listed under the variance request section.(AAG)

Table 1A includes the acreage used to calculate the surety estimate. The borders on sheets 1 through 6 of drawing IM-0101-3 should clearly describe the individual areas and acreage shown in Table 1A. Please modify these drawings accordingly.(AAG)

In the attached Slope Volume Calculations there are two sets of calculations entitled Future Comstock Dump and Future Comstock Waste Dump. Please explain their purpose and describe the different areas they apply to.(AAG)

In the attached Volume Calculations there is a section titled "Future Mt. Zion Waste Dump". This section includes an 880 ft. length. Please clarify where this cross section is and confirm that this should be the Mt. Lion dump.(AAG)

Totalling the acreage listed on sheets 1 through 6 of drawing IM-0101-3, for the three categories listed, gives the following: Prior Permit 386.86 acres, Delayed Mining 81.83 acres, Topsoil Borrow 42.47 acres. Adding the totals from these three categories gives a grand total of 511.16 acres, while table 1A lists a grand total of 477.05 acres. Please explain this discrepancy. We cannot proceed with our surety estimate calculation until we have answers to these questions.(AAG)

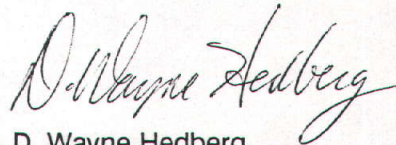
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R647-4-115 Confidential Information

On page 10 of the FORM MR-LMO (2/88 version) you have indicated that this submission contains confidential information. However, no portions of the submission have been identified as confidential. Please indicate which information you wish to be held as confidential. Be advised that only those portions which contain information relating to the location, size or nature of the deposit may be protected as confidential. Please format any confidential sections so the document still maintains some continuity in their absence.(AAG)

The Division will suspend further review of the Amended Iron Mountain NOI until your response to this letter is received. Given the extent of these outstanding questions, it is unlikely that the April 2, 1993 Board deadline for receipt of a replacement reclamation surety can be met. After you have reviewed this document, please contact us to arrange a meeting to discuss the details and timing of preparing a response. If you have any questions in this regard please contact me, Tony Gallegos, or Holland Shepherd of the Minerals Staff. Thank you for your efforts in consolidating the incongruous mine permits and for your cooperation in completing this permitting action.

Sincerely,



D. Wayne Hedberg
Permit Supervisor
Minerals Reclamation Program

jb
cc: Clayton Parr - Parr, Waddoups & Gee
Lowell Braxton, DOGM
Minerals staff (route)
M021008.rvw